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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. 11-0625 EMC
	)	
Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del>
	)	ORDER EXCLUDING TIME
v.	)	
	)	
BASSAM YACIOUB SALMAN,	)	
	)	
Defendant.	)	

WHEREAS, on October 26, 2011, the United States produced approximately 937,000 pages of documents and other materials to counsel for the defendant;

WHEREAS, counsel for the defendant needs time to review the discovery;

WHEREAS, a failure to grant the continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and under the circumstances, the ends of justice served by a reasonable continuance outweigh the best interest of the public and the defendant in a speedy trial;

WHEREAS, defendant Bassam Salman consents to the exclusion of time from December 14, 2011 to February 8, 2012;

STIPULATION AND ~~[PROPOSED]~~ ORDER EXCLUDING TIME  
*United States v. Salman*, Case No. 11-0625 EMC

1           THEREFORE, it is hereby stipulated by and between the parties, through their respective  
2 counsel of record, that the period of time from December 14, 2011 to February 8, 2012 shall be  
3 excluded in computing the time within which the trial of the offenses alleged in the Indictment  
4 must commence under Title 18, United States Code, Section 3161.

5 DATED: January 4, 2012

MELINDA HAAG  
United States Attorney

/s/  
\_\_\_\_\_

8 Adam A. Reeves  
Assistant United States Attorney

10 DATED: January 4, 2012

/s/  
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12 Gail Shifman, Esq.  
Counsel to Bassam Salman

14                               **[PROPOSED] ORDER EXCLUDING TIME**

15           PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:

16           The ends of justice are served by finding that a continuance from December 14, 2011 to  
17 February 8, 2012 outweighs the best interests of the public and the defendant in a speedy trial and  
18 the prompt disposition of criminal cases and the Court concludes that the exclusion of time from  
19 December 14, 2011 to February 8, 2012 should be made under Title 18, United States Code,  
20 Sections 3161(h)(7)(B)(iv).

21 DATED:    1/6/12



28 STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME  
*United States v. Salman*, Case No. 11-0625 EMC